

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

RED TREE INVESTMENTS, LLC,

Plaintiff,

-against-

PETRÓLEOS DE VENEZUELA, S.A. and  
PDVSA PETRÓLEO, S.A.,

Defendants.

Docket No.: 1:19-cv-002519  
(related to 1:19-cv-002523)

**NOTICE OF DEFENDANTS'**  
**MOTION FOR STAY**

**PLEASE TAKE NOTICE** that upon the accompanying Declaration of Dennis H. Tracey, III in Support of Defendants' Motion for Stay, and the exhibits thereto, the accompanying Memorandum of Law in Support of Defendants' Motion for Stay, and all proceedings and pleadings in this action, defendants Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A., by and through their undersigned counsel, will move this Court, the United States District Court for the Southern District of New York at the courthouse thereof, located at 40 Foley Square, New York, New York 10007, before the Honorable Alison J. Nathan, for a stay of all proceedings in the above-captioned action and for such other and further relief as the Court deems just and proper.

New York, New York  
March 27, 2019

Respectfully submitted,

By: /s/ Dennis H. Tracey, III  
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